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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

STEVEN COXSON, et al.,

Plaintiffs,

vs.

BANK OF AMERICA HOME LOANS, a  
wholly owned subsidiary of BANK OF  
AMERICA N.A., a foreign corporation; BAC  
HOME LOANS SERVICING, LP;  
COUNTRYWIDE HOME LOANS, INC., a  
foreign corporation; COUNTRYWIDE BANK,  
N.A., a foreign corporation; COUNTRYWIDE  
FINANCIAL CORP., a foreign corporation;  
THE BANK OF NEW YORK MELLON f/k/a  
THE BANK OF NEW YORK AS TRUSTEE  
FOR THE CERTIFICATEHOLDERS  
CWALT, INC. ALTERNATIVE LOAN  
TRUST 2005-70CB MORTGAGE PASS  
THROUGH CERTIFICATES, SERIES 2005-  
70CB; et al.,

Defendants.

Case: 2:10-cv-00073-JCM-PAL

**JOINT MOTION TO EXTEND  
DEADLINES**

**(First Request)**

Plaintiff Steven Coxson ("Plaintiff") and Defendants, Bank of America Home Loans, BAC Home Loans Servicing, LP, Countrywide Home Loans, Inc., Countrywide Bank, N.A., Countrywide Financial Corp., and The Bank of New York Mellon ("Defendants"), through their undersigned counsel of record, jointly move pursuant to Local Rules 6-1 and 26-4 for an order extending the discovery and case management deadlines.

The parties exchanged initial disclosure statements pursuant to Rule 26(a)(1)(A), but have conducted limited discovery. The parties have been engaging in a settlement

1 dialogue and hope to continue that dialogue without incurring additional expense on  
2 discovery. Nonetheless, if the parties are unsuccessful in achieving a settlement, both  
3 sides intend to notice depositions and propound/respond to written discovery.

4 This is the parties' first request for an extension of deadlines, which they are  
5 making in good faith and not for the purpose of delaying this litigation. The parties seek  
6 to extend the deadlines primarily in order to further explore settlement of this case. The  
7 parties have conferred as to workable deadlines for both the completion of discovery and  
8 other deadlines, and propose the following new case deadlines in this matter:

- 9 1. **Discovery:** The discovery deadline will be September 22, 2010.
- 10 2. **Dispositive motions:** The dispositive motions deadline will be October 13,  
11 2010.
- 12 3. **Pretrial Order:** The deadline for filing the joint pretrial order shall be  
13 November 12, 2010. Should the parties file a dispositive motion, this  
14 deadline shall be suspended until thirty days after decision of dispositive  
15 motions or further order of the Court. The parties shall negotiate a schedule  
16 for exchange of final lists of witnesses and exhibits, and any objections  
17 thereto, that will enable them to prepare a joint pretrial order in time to  
18 meet this deadline.
- 19 4. **Other deadlines:** All other deadlines set out in the Stipulated Discovery  
20 Plan and Scheduling Order dated March 4, 2010, (Dkt. # 29), remain the  
21 same.

22 Dated this 26<sup>th</sup> day of August, 2010.

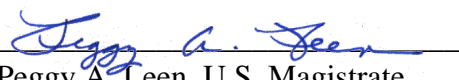
23 **LEWIS AND ROCA LLP**

**CALLISTER & ASSOCIATES, LLC**

24  
25 /s/J. Christopher Jorgensen  
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28 IT IS SO ORDERED this 30th day of August, 2010.

  
Peggy A. Leen, U.S. Magistrate

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing document was served on counsel, listed below, on the 26<sup>th</sup> day of August 2010, through the court's electronic service system:

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